

Tom Nunes
Nunesdale Farms
4255 River Rd.
Santa Rosa, CA 95401
Ph: 707-542-0181
Email: nunesdale@aol.com

My name is Tom Nunes; I am part of the third generation of a large four generation dairy family here in California. I want to take this opportunity to submit comments regarding the National Animal Identification System (NAIS) Draft Strategic Plan and Program Standards.

1. I support the implementation of NAIS as a **Mandatory** program. The loss of markets and demands of the market place, plus the real risks that our cattle population is venerable too makes it imperative that NAIS be implemented as quickly as possible. Given human nature, many people will not participate until they have too.
2. I strongly support the NAIS Cattle Industry Working Group calling for individual identification of all cattle, utilizing ISO-compliant Radio Frequency Identification Device (RFID) ear tags as the standard for implementing the NAIS in the U.S. cattle industry. In order to encourage investment and development of improved technology by companies serving the livestock industry the NAIS cannot be Technology Neutral and needs to adopt species agreed upon technology. Technology neutral is cost prohibitive because in the market place all forms of ID equipment would have to be available for animals showing up with varying type of ID.
3. Since the half duplex RFID ear tag is resulting in greater accuracy in current pilot projects tracking animal movement through the market place, it should be the official identifier rather than the full duplex tag.
4. Since the NAIS timeline calls for All States to be capable of premises registration in July 2005, and the Animal Identification Number system operational also in July 2005, animals entering the food chain in January of 2006 should be tagged. This initial first step can be accomplished in a short period of time boosting consumer confidence and convince our international trading partners to open their markets to us.
5. Reporting of defined animal movements and requiring the entire NAIS program to be mandatory cannot be accomplished with current state and federal funding. The development of technology and infrastructure will require more time and funds. But getting animals tagged now will significantly improve our current traceability capability and provide incentives for increased investment in technology and infrastructure development.

Addressing Producer Concerns:

1. Financial

As a producer this is a huge concern I share with my fellow producers. Cost of the ear tag and the tagging of my animals is an expense I am prepared to absorb. The potential cost of the entire program is staggering if it becomes an entirely Government Regulatory Program. Funding of other farm programs is already a difficult challenge and negative impacts to other programs and taxes on all of us need to be considered. As a producer I want some cost control and a producer friendly program that does not require the creation of a new large government bureaucracy.

2. Confidentiality

In view of the political climate and recent increases in the incidence and breach of confidential data I have no confidence that legislation will be in place to protect me. I want some control and my data kept in the private sector.

3. Flexibility

My current service providers and management systems need to be utilized and duplication of costs and time need to be avoided.

4. Liability

In today's legal environment, reducing my exposure to liability is of utmost importance. Control of my data and the ability to verify the good husbandry practices that I use in the handling and care of my livestock are extremely important to me.

Conclusion:

The only way to address these producer concerns is through a public/private partnership. The Michigan TB eradication program provides an excellent model of how this can and should work. The livestock industry now accepts the need for NAIS. The climate is right for industry alliances to be made, concerns and problems shared, allowing for the consensus to move forward with a private data management system that meets the disease traceability goals of the NAIS.

Basis for my comments:

Besides being part of a large dairy family that is operating large dairies in a state where 20% of this nations milk supply comes from. As well as being in concentrated areas such as Tulare County, where the introduction of a foreign

animal disease regardless if it was intentional or accidental, would be a tremendous blow to confidence in our nations food supply. I am also immediate past president of Holstein Association USA, Inc., the largest Dairy Cattle breed association in the world.

The past two years representing the Holstein Association has taken me to all regions of the U.S. visiting with producers and taking the pulse of our industry. In that same time period I visited a number of foreign countries that included Japan, Canada, Mexico, and several European countries, where I visited with producers, observed and asked questions about their experiences with animal ID.

As a member of the Cattle Industry Working Group I have been actively involved in the development of the USAIP and now NAIS. All though my back ground is in the Dairy Industry, I have many Beef Cattlemen as friends and the cattle working group has made me aware of concerns and problems unique to them. I am confident we can find the consensus to cause NAIS to become a reality sooner rather then later.

Thank you for the opportunity to submit comments and participate in the process.